



NEW YORK
400 MADISON AVE., 10TH FL
NEW YORK, NEW YORK, 10017
TELEPHONE: (212) 213-8844
FACSIMILE: (212) 213-3318

NEW JERSEY
51 JFK Parkway
Short Hills, New Jersey 07078
Telephone (973) 379-0038
Facsimile (973) 379-0048

March 7, 2025

VIA CM/ECF

Hon. Jennifer H. Rearden
United States District Court
Southern District of New York
500 Pearl Street, Room 1010
New York, New York 10007

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Re: *Sound Around, Inc. v. Friedman et al.*
Case No. 1:24-cv-01986

Dear Judge Rearden:

This firm represents Defendants Moises Friedman, Shulim Eliezer Ilowitz, ML Imports, Inc., CYRF, Inc., LRI Group, LLC, MDF Marketing Inc., and World Group Import, LLC (“Defendants”) in the above-referenced matter. This joint letter is submitted after conferring with counsel for Plaintiff Sound Around, Inc., as required by Your Honor in the January 15, 2025 Text Order. (See ECF Doc. No. 125).

Together, we respectfully submit proposed deadlines for pre-hearing submissions and additional briefing for the preliminary injunction scheduled for May 13, 2025. The parties propose the following deadlines:

- April 25, 2025: All parties exchange and provide the Court with affidavits constituting direct testimony, deposition excerpts to be introduced as direct evidence and a synopsis thereof, and documentary exhibits to be used at the hearing;
- May 1, 2025: All parties exchange and provide the Court with the list of affiants they wish to cross-examine at the hearing;
- May 7, 2025: All parties exchange and provide the Court with pre-hearing briefs, which shall not exceed 25 pages.

Thank you for your consideration.

Sincerely,

/s/Megan J. Muoio

Megan J. Muoio

cc: All counsel (via ECF)